

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

NATALIE WILLINGHAM,
NADINE HIELSCHER AND
ROBERT HEILSCHER,
individually, and on behalf of all
others similarly situated,

Plaintiffs,

v.

GLOBAL PAYMENTS, INC.,

Defendant.

CASE NO.: 1:12-cv-01157-RWS-JFK

CLASS ACTION

JURY TRIAL DEMANDED

**DEFENDANT GLOBAL PAYMENTS, INC.'S MOTION TO DISMISS
PLAINTIFFS' AMENDED COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), Defendant Global Payments Inc. ("GP") hereby moves this Court to dismiss all of the claims Plaintiffs assert in their Amended Complaint. Plaintiffs' claims against GP should be dismissed because Plaintiffs lack standing to assert those claims and because Plaintiffs fail to state a claim upon which relief may be granted for the reasons set forth in GP's Memorandum in Support of Motion to Dismiss Plaintiffs' Amended Complaint, which is filed contemporaneously herewith and incorporated herein by reference.

Respectfully submitted this the 16th day of August, 2012.

/s/Kristine McAlister Brown

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1(C)

I hereby certify that the foregoing **DEFENDANT GLOBAL PAYMENTS INC.'S MOTION TO DISMISS PLAINTIFFS' AMENDED COMPLAINT** has been prepared in a Times New Roman 14 point font, one of the font and point selections approved by the Court in Local Rule 5.1(C).

/s/ Kristine McAlister Brown
Kristine McAlister Brown

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of August, 2012, a copy of the foregoing **DEFENDANT GLOBAL PAYMENTS INC.'S MOTION TO DISMISS PLAINTIFFS' AMENDED COMPLAINT** was served via electronic filing, upon all attorneys of record, including:

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